

## COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS DEPARTMENT OF ENVIRONMENTAL PROTECTION

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ELLEN ROY HERZFELDER Secretary LAUREN A. LISS Commissioner

To: Massachusetts Generators of Hazardous Waste

From: Steven A. DeGabriele, Director, Business Compliance Division

Date: January 6, 2003

RE: Use of Temporary Hazardous Waste Generator Identification Numbers

The Department of Environmental Protection (DEP) has found that some generators of hazardous waste and waste oil are improperly listing temporary generator identification numbers (ID) in Item 1 of hazardous waste manifests. I am writing to remind you that, if you have a permanent ID, that number must be used on your manifests.

Massachusetts hazardous waste regulations – found at 310 CMR 30.061(1), 30.253(9)(a)(b) and 30.353(5) – require anyone who routinely generates hazardous waste and/or waste oil to register with DEP or notify the agency of its activity, and to obtain a permanent ID.

If you are a Large Quantity Generator (LQG) or Small Quantity Generator (SQG) of hazardous waste and/or a LQG of waste oil, you are required to apply for and obtain a permanent ID as soon as possible. You may use a self-assigned temporary ID for hazardous waste and waste oil shipments only until DEP issues you a permanent state/U.S. Environmental Protection Agency ID. Once the permanent ID has been issued, it must be listed in Item 1 of every hazardous waste manifest you use.

If you are a Very Small Quantity Generator (VSQG) of hazardous waste or a SQG of waste oil, you must assign yourself a permanent ID and register that number with DEP. You should use that number on all manifests after mailing your registration form to DEP, and should never use a temporary ID.

Your transporter may assist you in completing the Generator portion of the manifest. By signing Item 16 of the manifest, however, *you* are certifying that the information entered on the manifest above *your* signature, including the ID in Item 1, is correct. Please be sure that everyone on your staff who completes manifests is aware of this provision and knows your permanent ID number (whether it was issued by DEP or self-assigned). Generators misusing temporary IDs are subject to enforcement action.

We have prepared a fact sheet that explains who must assign them self an ID and how to do this. The fact sheet is available from DEP's web site at

http://www.state.ma.us/dep/bwp/dhm/dhmpubs.htm#fact. If you have previously notified DEP or registered with the agency, but do not have a record of your permanent ID – or if you are not sure whether you have ever been assigned a permanent number – please contact David Biggers of the DEP Bureau of Waste Prevention at (617) 292-5787 for assistance.